



# San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

JAN 05 2015



Mr. Michael Hart  
Ardagh Glass, Inc.  
24441 Avenue 12  
Madera, CA 93637

**Re: Notice of Minor Title V Permit Modification**  
**District Facility # C-801**  
**Project # 1140803**

Dear Mr. Hart:

Enclosed is the District's analysis of your application for minor Title V permit modification for the facility identified above. You proposed a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-801-32-2 into the Title V operating permit. This ATC authorized the routine replacement of one 5.0 MMBtu/hr natural gas fired Lehr with a 3.2 MMBtu/hr natural gas fired Lehr. The Lehr being replaced in this project is located in shop #13 and serves furnace #1.

Enclosed is the engineering evaluation with the following attachments: proposed modified Title V permit, recently issued ATC C-801-32-2, application, and previous Title V permit. This project will be subject to a 45-day EPA commenting period prior to the District taking final action.

If you have any questions, please contact Mr. Jim Swaney, Permit Services Manager, at (559) 230-5900.

Thank you for your cooperation in this matter.

Sincerely,

  
Arnaud Marjollet  
Director of Permit Services

Enclosures

cc: Gerardo C. Rios, EPA (w/enclosure) via email

Seyed Sadredin  
Executive Director/Air Pollution Control Officer

Northern Region  
4800 Enterprise Way  
Modesto, CA 95356-8718  
Tel: (209) 557-6400 FAX: (209) 557-6475

Central Region (Main Office)  
1990 E. Gettysburg Avenue  
Fresno, CA 93726-0244  
Tel: (559) 230-6000 FAX: (559) 230-6061

Southern Region  
34946 Flyover Court  
Bakersfield, CA 93308-9725  
Tel: 661-392-5500 FAX: 661-392-5585

## **TITLE V APPLICATION REVIEW**

Minor Modification  
Project #: 1140803

Engineer: Dustin Brown  
Date: January 5, 2015

Facility Number: C-801  
Facility Name: Ardagh Glass, Inc.  
Mailing Address: 24441 Avenue 12  
Madera, CA 93637

Contact Name: Michael Hart  
Phone: (765) 741-7240

Responsible Official: Michael Hart  
Title: VP-Energy and Sustainability

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### **I. PROPOSAL**

Ardagh Glass is proposing a Title V minor permit modification to incorporate recently issued Authority to Construct (ATC) C-801-32-2 into the Title V operating permit. This ATC authorized the routine replacement of one 5.0 MMBtu/hr natural gas fired Lehr with a 3.2 MMBtu/hr natural gas fired Lehr. The Lehr being replaced in this project is located in shop #13 and serves furnace #1.

In addition, Ardagh Glass originally proposed to incorporate recently issued ATC C-801-1-14 into the Title V operating permit as a part of this project. However, since that time, ATC C-801-1-14 was superseded and replaced by ATC C-801-1-17 and will therefore be cancelled. Therefore, ATC C-801-1-14 will not be included into the Title V permit and is not being processed as a part of this project.

The purpose of this evaluation is to identify all applicable requirements, determine if the facility will comply with the applicable requirements and to provide the legal and factual basis for the proposed revisions.

### **II. FACILITY LOCATION**

Ardagh Glass is located at 24441 Avenue 12 and Road 24 ½ in Madera, CA.

### III. EQUIPMENT DESCRIPTION

Current Permit Equipment Description:

**C-801-32-1:** 5.0 MMBTU/HR NATURAL GAS-FIRED LEHR SHOP #13 FOR FURNACE #1

ATC Equipment Description:

**C-801-32-2:** MODIFICATION OF 5.0 MMBTU/HR NATURAL GAS-FIRED LEHR SHOP #13 FOR FURNACE #1: ROUTINE REPLACEMENT OF LEHR WITH A 3.2 MMBTU/HR NATURAL GAS-FIRED LEHR

Post Project Equipment Description:

**C-801-32-5:** 3.2 MMBTU/HR NATURAL GAS-FIRED LEHR SHOP #13 FOR FURNACE #1

### IV. SCOPE OF EPA AND PUBLIC REVIEW

This change to a Title V permit is considered to be a minor modification and, as such, requires no public review.

### V. APPLICABLE REQUIREMENTS

District Rule 2520, Federally Mandated Operating Permits (Adopted June 21, 2001)

### VI. DESCRIPTION OF PROPOSED MODIFICATIONS

Ardagh Glass is proposing to modify one 5.0 MMBtu/hr natural gas fired Lehr by replacing it with a 3.2 MMBtu/hr natural gas fired Lehr. The Lehr being modified within this project is located in shop #13 and serves furnace #1. There will be no changes to the methods of operation of this Lehr or the facility operations as a part of this project.

There are no emission increases associated with the proposed changes to these container glass furnaces.

Existing PTO Changes:

All existing conditions from the current permit have been included in the requirements for this revised permit.

ATC Condition Changes:

ATC condition 1 has been removed and not included in the requirements for this revised permit as Ardagh Glass has submitted the appropriate Title V minor modification application to incorporate this ATC in to their Title V operating permit.

ATC condition 2 has been removed and not included in the requirements for this revised permit as the visible emission requirements specified in this condition are already included as condition 22 on Facility Wide permit C-801-0-3.

**VII. COMPLIANCE**

In accordance with Rule 2520, 3.20, these modifications:

1. Do not violate requirements of any applicable federally enforceable local or federal requirement;
2. Do not relax monitoring, reporting, or recordkeeping requirements in the permit and are not significant changes in existing monitoring permit terms or conditions;
3. Do not require or change a case-by-case determination of an emission limitation or other standard, or a source-specific determination for temporary sources of ambient impacts, or a visibility or increment analysis;
4. Do not seek to establish or change a permit term or condition for which there is no corresponding underlying applicable requirement and that the source has assumed to avoid an applicable requirement to which the source would otherwise be subject. Such terms and conditions include;
  - a. A federally enforceable emission cap assumed to avoid classification as a modification under any provisions of Title I of the Federal Clean Air Act; and
  - b. An alternative emissions limit approved pursuant to regulations promulgated under section 112(i)(5) of the Federal Clean Air Act; and
5. Are not Title I modifications as defined in District Rule 2520 or modifications as defined in section 111 or 112 of the Federal Clean Air Act; and
6. Do not seek to consolidate overlapping applicable requirements.

In accordance with Rule 2520, the application meets the procedural requirements of section 11.4 by including;

1. A description of the change, the emissions resulting from the change, and any new applicable requirements that will apply if the change occurs;
2. The source's suggested draft permit; and
3. Certification by a responsible official that the proposed modification meets the criteria for use of minor permit modification procedures and a request that such procedures be used.

## **VIII. ATTACHMENTS**

- A. Proposed Modified Title V Operating Permit C-801-32-5
- B. Authority to Construct C-801-32-2
- C. Application
- D. Previous Title V Operating Permit C-801-32-1

# ATTACHMENT A

Proposed Modified Title V Operating Permit  
C-801-32-5

# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-801-32-5

**EXPIRATION DATE:** 01/31/2015

**EQUIPMENT DESCRIPTION:**

3.2 MMBTU/HR NATURAL GAS-FIRED LEHR SHOP #13 FOR FURNACE #1

## PERMIT UNIT REQUIREMENTS

1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Discharge of sulfur compounds shall not exceed in concentration at the point of discharge 0.2 percent by volume calculated as SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 4102]
4. This unit shall be fired on PUC regulated natural gas or LPG backup fuel only. [District Rules 2201 and 4301] Federally Enforceable Through Title V Permit
5. Emissions from this lehr shop shall not exceed any of the following limits: 0.073 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 0.015 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201 and 4301] Federally Enforceable Through Title V Permit
6. The permittee shall maintain records of the daily fuel use for this lehr operation. [District Rule 2520] Federally Enforceable Through Title V Permit
7. All records required to be maintained by this permit shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
8. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201 (as amended December 17, 1992), District Rule 4202 (as amended December 17, 1992), and District Rule 4801 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.

# ATTACHMENT B

Authority to Construct  
C-801-32-2





**San Joaquin Valley**  
AIR POLLUTION CONTROL DISTRICT



## AUTHORITY TO CONSTRUCT

PERMIT NO: C-801-32-2

ISSUANCE DATE: 05/30/2013

**LEGAL OWNER OR OPERATOR:** SAINT-GOBAIN CONTAINERS, INC  
**MAILING ADDRESS:** ATTN: ENVIRONMENTAL MANAGER/V. KRULIC  
PO BOX 4200  
MUNCIE, IN 47307-4200

**LOCATION:** 24441 AVENUE 12 & ROAD 24 1/2  
MADERA, CA 93637

**EQUIPMENT DESCRIPTION:**

MODIFICATION OF 5.0 MMBTU/HR NATURAL GAS-FIRED LEHR SHOP #13 FOR FURNACE #1: ROUTINE REPLACEMENT OF LEHR WITH A 3.2 MMBTU/HR NATURAL GAS-FIRED LEHR

### CONDITIONS

1. The facility shall submit an application to modify the Title V permit in accordance with the timeframes and procedures of District Rule 2520. [District Rule 2520] Federally Enforceable Through Title V Permit
2. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
3. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
4. Discharge of sulfur compounds shall not exceed in concentration at the point of discharge 0.2 percent by volume calculated as SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801] Federally Enforceable Through Title V Permit
5. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 4102]
6. This unit shall be fired on PUC regulated natural gas or LPG backup fuel only. [District Rules 2201 and 4301] Federally Enforceable Through Title V Permit

CONDITIONS CONTINUE ON NEXT PAGE

YOU MUST NOTIFY THE DISTRICT COMPLIANCE DIVISION AT (559) 230-5950 WHEN CONSTRUCTION IS COMPLETED AND PRIOR TO OPERATING THE EQUIPMENT OR MODIFICATIONS AUTHORIZED BY THIS AUTHORITY TO CONSTRUCT. This is NOT a PERMIT TO OPERATE. Approval or denial of a PERMIT TO OPERATE will be made after an inspection to verify that the equipment has been constructed in accordance with the approved plans, specifications and conditions of this Authority to Construct, and to determine if the equipment can be operated in compliance with all Rules and Regulations of the San Joaquin Valley Unified Air Pollution Control District. Unless construction has commenced pursuant to Rule 2050, this Authority to Construct shall expire and application shall be cancelled two years from the date of issuance. The applicant is responsible for complying with all laws, ordinances and regulations of all other governmental agencies which may pertain to the above equipment.

Sayed Sadredin, Executive Director / APCO

  
DAVID WARNER, Director of Permit Services

C-801-32-2: May 30 2013 1:30PM - TOMB : Joint Inspection NOT Required

7. Emissions from this lehr shop shall not exceed any of the following limits: 0.073 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 0.015 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rules 2201 and 4301] Federally Enforceable Through Title V Permit
8. The permittee shall maintain records of the daily fuel use for this lehr operation. [District Rule 2520] Federally Enforceable Through Title V Permit
9. All records required to be maintained by this permit shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2520] Federally Enforceable Through Title V Permit
10. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201 (as amended December 17, 1992), District Rule 4202 (as amended December 17, 1992), and District Rule 4801 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520] Federally Enforceable Through Title V Permit

# ATTACHMENT C

Application

# San Joaquin Valley Air Pollution Control District

www.valleyair.org


**RECEIVED**

MAR 12 2014

## Permit Application For:

Permits Services  
SJVAPCD

[ ] ADMINISTRATIVE AMENDMENT    [x] MINOR MODIFICATION    [ ] SIGNIFICANT MODIFICATION

1. PERMIT TO BE ISSUED TO: Saint-Gobain Containers, Inc	
2. MAILING ADDRESS:  STREET/P.O. BOX: P.O. Box 4200  CITY: Muncie STATE: IN 9-DIGIT ZIP CODE: 47307-4200	
3. LOCATION WHERE THE EQUIPMENT WILL BE OPERATED:  STREET: 24441 Avenue 12 CITY: Madera  1/4 SECTION TOWNSHIP RANGE	INSTALLATION DATE: February 2014
4. GENERAL NATURE OF BUSINESS: Container glass production	
5. DESCRIPTION OF EQUIPMENT OR MODIFICATION FOR WHICH APPLICATION IS MADE (include Permit #'s if known, and use additional sheets if necessary)  C-801-1-14: Conversion of Furnace 1 to oxy-fuel furnace C-801- 32-2: Lehr replacement	
6. TYPE OR PRINT NAME OF APPLICANT: Michael T.Hart	TITLE OF APPLICANT: VP- Energy and Sustainability
7. SIGNATURE OF APPLICANT: 	DATE: 3/5/2014 PHONE: 765) 741-7240 FAX: EMAIL: Michael.T.Hart@saint-gobain.com

### For APCD Use Only:

DATE STAMP	FILING FEE RECEIVED: \$19.00 (\$76.00)	CHECK#: 02700548
	DATE PAID: 3-12-14	
	PROJECT NO: C-1140803	FACILITY ID: C-801

San Joaquin Valley  
Unified Air Pollution Control District

Certification of Truth and Accuracy

Company Name: <u>SAINT-GOBAIN CONTAINER INC</u>	Facility ID: <u>C-801</u>
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I declare, under penalty of perjury under the laws of the state of California that based on information and belief formed after reasonable inquiry, the statements and information provided in the document are true, accurate, and complete:

  
\_\_\_\_\_  
Signature of Responsible Official

3/5/2014  
\_\_\_\_\_  
Date

T. MICHAEL HART  
\_\_\_\_\_  
Name of Responsible Official (please print)

VP ENERGY & SUSTAINABILITY  
\_\_\_\_\_  
Title of Responsible Official (please print)

**San Joaquin Valley  
Unified Air Pollution Control District**

**TITLE V MODIFICATION - COMPLIANCE CERTIFICATION FORM**

**I. TYPE OF PERMIT ACTION (Check appropriate box)**

☐ SIGNIFICANT PERMIT MODIFICATION  
☒ MINOR PERMIT MODIFICATION

☐ ADMINISTRATIVE  
AMENDMENT

COMPANY NAME: Saint-Gobain Containers, Inc.	FACILITY ID: C- 801
1. Type of Organization: <input checked="" type="checkbox"/> Corporation <input type="checkbox"/> Sole Ownership <input type="checkbox"/> Government <input type="checkbox"/> Partnership <input type="checkbox"/> Utility	
2. Owner's Name: Saint-Gobain Containers, Inc.	
3. Agent to the Owner: n/a	

**II. COMPLIANCE CERTIFICATION (Read each statement carefully and initial all circles for confirmation):**

- ☐ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will continue to comply with the applicable federal requirement(s).
- ☐ Based on information and belief formed after reasonable inquiry, the equipment identified in this application will comply with applicable federal requirement(s) that will become effective during the permit term, on a timely basis.
- ☐ Corrected information will be provided to the District when I become aware that incorrect or incomplete information has been submitted.
- ☐ Based on information and belief formed after reasonable inquiry, information and statements in the submitted application package, including all accompanying reports, and required certifications are true accurate and complete.

I declare, under penalty of perjury under the laws of the state of California, that the forgoing is correct and true:



Signature of Responsible Official  
Mike Hart

3/5/2014

Date

\_\_\_\_\_  
Name of Responsible Official (please print)  
VP – Energy and Sustainability

\_\_\_\_\_  
Title of Responsible Official (please print)

0146111V#123  
Logged in 3-10-14



RECEIVED

MAR 12 2014

Permits Services  
SJVAPCD

Certified Mail  
Return Receipt Requested

March 5, 2014

Stanley Tom  
San Joaquin Valley Air Pollution Control District  
1990 E. Gettysburg Avenue  
Fresno, CA 93726

**Re: Application for Administrative Amendment to Title V Permit  
Saint-Gobain Containers, Inc. (Madera, CA)**

Dear Mr. Tom:

Enclosed please find a copy of an application submitted by Saint-Gobain Containers, Inc. (SGCI) for an administrative amendment to the Title V Operating Permit for our facility located in Madera, California.

Thank you for your consideration. Please feel free to contact Jayne Browning at (765) 741-7112 or Steve Branoff of ENVIRON at (510) 420-2540 regarding this matter.

Sincerely,

Mike Hart  
VP- Energy and Sustainability

# ATTACHMENT D

Previous Title V Operating Permit  
C-801-32-1



# San Joaquin Valley Air Pollution Control District

**PERMIT UNIT:** C-801-32-1

**EXPIRATION DATE:** 01/31/2015

**EQUIPMENT DESCRIPTION:**

5.0 MMBTU/HR NATURAL GAS-FIRED LEHR SHOP #13 FOR FURNACE #1

## PERMIT UNIT REQUIREMENTS

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1. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
2. Discharge of sulfur compounds shall not exceed in concentration at the point of discharge 0.2 percent by volume calculated as SO<sub>2</sub>, on a dry basis averaged over 15 consecutive minutes. [District Rule 4801, 3.1] Federally Enforceable Through Title V Permit
3. All equipment shall be maintained in good operating condition and shall be operated in a manner to minimize emissions of air contaminants into the atmosphere. [District Rule 4102]
4. This unit shall be fired on PUC regulated natural gas or LPG backup fuel only. [District Rule 4301] Federally Enforceable Through Title V Permit
5. Emissions from this lehr shop shall not exceed any of the following limits: 0.073 lb-NO<sub>x</sub>/MMBtu, 0.00285 lb-SO<sub>x</sub>/MMBtu, 0.0076 lb-PM<sub>10</sub>/MMBtu, 0.015 lb-CO/MMBtu, or 0.0055 lb-VOC/MMBtu. [District Rule 4301, 5.2] Federally Enforceable Through Title V Permit
6. The permittee shall maintain records of the daily fuel use for this lehr operation. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
7. All records required to be maintained by this permit shall be retained on-site for a period of at least five years and made available for District inspection upon request. [District Rule 2520, 9.4.2] Federally Enforceable Through Title V Permit
8. Compliance with the conditions in the permit requirements for this unit shall be deemed compliance with District Rule 4201 (as amended December 17, 1992), District Rule 4202 (as amended December 17, 1992), and District Rule 4801 (as amended December 17, 1992). A permit shield is granted from these requirements. [District Rule 2520, 13.2] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.